

1 DANIEL G. BOGDEN
United States Attorney
2 ADAM M. FLAKE
Assistant United States Attorney
3 333 Las Vegas Blvd. South
Suite 5000
4 Las Vegas, Nevada 89101
(702) 388-6336

5 **UNITED STATES DISTRICT COURT**
6 **DISTRICT OF NEVADA**

7 **-oOo-**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 LADON McCLELLAN,

13 Defendant.

2:08-cr-288-PMP-RJJ

GOVERNMENT'S UNOPPOSED
REQUEST FOR EXTENSION OF TIME TO
FILE RESPONSE TO PETITION FOR WRIT
OF CORAM NOBIS

14
15 The United States of America, by and through Daniel G. Bogden, United States
16 Attorney, and Adam M. Flake, Assistant United States Attorney, respectfully requests that
17 this Court enter an order allowing the Government until October 11, 2012, to respond to
18 Defendant Ladon McClellan's petition for writ of coram nobis. This request is based on the
19 following:

- 20 1. On August 14, 2012, this Court ordered the Government to file a response
21 to McClellan's petition for writ of coram nobis by September 11, 2012.
- 22 2. The undersigned needs more time to become familiar with the record in this
23 case and to research the legal issues McClellan's petition raises in order to
24 properly formulate a response, and therefore requests a 30-day extension.
- 25 3. On September 5, 2012, the undersigned spoke with McClellan's counsel,
26 Conor Flynn, who stated that he has no opposition to this request.

1 4. The undersigned avows that this extension is not sought for purposes of
2 delay and anticipates that the Government's response will be filed with in the
3 additional time requested in this motion.

4 5. McClellan is not in custody.

5 **DATED:** this 5th day of September 2012.

6 Respectfully submitted,

7 DANIEL G. BOGDEN
8 United States Attorney

9 _____
10 /s/ Adam M. Flake
11 ADAM M. FLAKE
12 Assistant United States Attorney
13
14
15
16
17
18
19
20
21
22
23
24
25
26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

-oOo-

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LADON McCLELLAN,

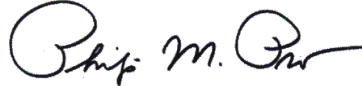
Defendant.

) 2:08-cr-288-PMP-RJJ

) GOVERNMENT'S UNOPPOSED
) REQUEST FOR EXTENSION OF TIME TO
) FILE RESPONSE TO PETITION FOR WRIT
) OF CORAM NOBIS

Based on the pending application of the Government, and good cause appearing,
IT IS THEREFORE ORDERED that the that the Government's response to
Defendant's petition for writ of coram nobis is due October 11, 2012.

DATED: this _ 7th day of September, 2012.



UNITED STATES DISTRICT JUDGE